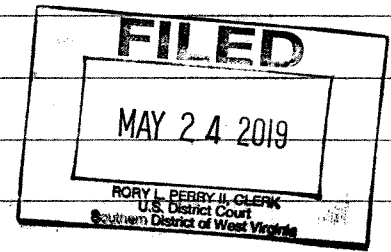


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT

Andre Williamson,
Plaintiff,



v

2:19-cv-0405

Warden Ames; Col. Frame; Betsy Jividen, Commissioner;
Sgt. Perkins; C.O. John Doe;
Defendants;

Complaint

1. On May 12th 2019 Andre Williamson, Plaintiff, was housed in the Quilliams One segregated isolation unit at Mount Olive Correctional Complex, cell number 605.
2. On the date above the Plaintiff was in his cell laying on his bunk when Correctional Officer John Doe unlocked the Plaintiffs cell door electronically from Quilliams One tower allowing an inmate to enter the cell and assault the Plaintiff.
3. Prior to the above assault the Plaintiff filed several grievances stating that officers had issued threats of assault.
4. As a result of the Defendants actions the Plaintiff suffered the following:
 - a. Multiple bruises to his face, neck, chest, and arms nausea, and headaches.

b. Emotional trauma as a result of the above action
loss of sleep, panic attacks, and stress from the fear
of another assault.

c. Violation of his Eighth Amendment rights
under the United States Constitution.

d. Freedom from Cruel and Unusual Punishment,

e. Freedom from being assaulted

f. Freedom from deliberate indifference to his safety.

5. For the said actions above the Plaintiff requests
that this Court:

a. Award compensatory damages in the amount of
\$25,000 per Defendant

b. Punitive damages of \$150,000

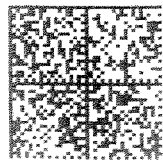
c. Transfer from Mount Olive Correctional Complex.

Plaintiff does swear that the aforesaid is true and
accurate under penalty of perjury.

Signed this 21st day of May, 2019

Andre Williamson

Andre Williamson, pro se



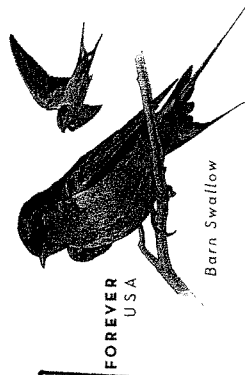
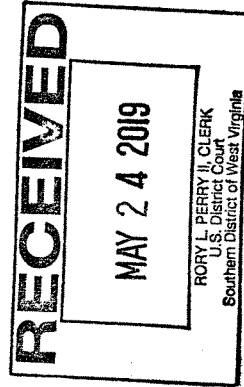
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Correspondence from an
Inmate at Mount Olive
Correctional Complex and Jail

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Andre Williamson 3514949
M.O.C.C.
2 monton side way
Mt Olive WV 25185



United States District Court
P.O. Box 2546
Charleston WV 25329